

MARA FLAMM V. SARNER & ASSOCIATES, P.C., ET AL.

**MOTION OF ATTORNEY DEFENDANTS TO DISMISS PLAINTIFF'S
COMPLAINT PURSUANT TO RULES 12(b)(1) AND 12(b)(6)**

DEFENDANTS' EXHIBIT 11

January 28, 2002 Letter, Robert P. Brand to Joshua Sarner

W&B

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January 28, 2002

Via Facsimile Transmission & U.S. Mail
(215) 568-1044Joshua Sarnet, Esquire
SARNER & ASSOCIATES
11 Penn Center, 29th Floor
Philadelphia, PA 19103RE: Jodi H. Brown, M.D. v. Mara Flamm

Dear Mr. Sarnet:

On Friday, January 25th an employee of your firm appeared at Ms. Flamm's workplace harassing her and her fellow employees. When he was unable to speak with Ms. Flamm, he demanded to see her supervisor and then the dean of the College. When that was not possible, he took an administrative assistant aside and screamed at her that he did not know what type of people they hire at Peirce College and that she owes \$6000 to a doctor. He further told the administrative assistant that Ms. Flamm has been giving different names and addresses in efforts to avoid him. He yelled at the administrative assistant and told her that the next time he came back would be with the Sheriff to arrest Ms. Flamm. He concluded his tirade by stating Peirce College has a hired a "sneaky little thief".

I do not know what type of practice you run, but this type of workplace harassment and defamation are unacceptable and actionable at law. I am further incensed that you engaged in this type of harassment knowing full well that Ms. Flamm is my wife. I expected some type of civility from you and your firm but received none. You will receive the same courtesies from me in the suit I intend to file against you and your firm.

Very truly yours,

WILK & BRAND, P.C.


ROBERT P. BRAND